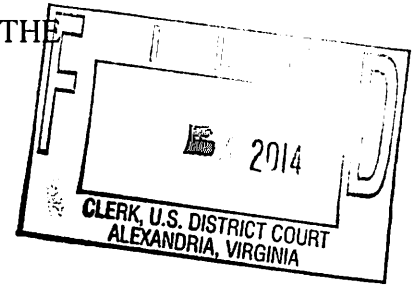


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)
)
v.)
)
KNUTE S. RONDUM)
)
Defendant.)

CASE NO. 1:14-MJ-116

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Kristina M. Eyler, being duly sworn, depose and state:

1. I am a Special Agent with the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), assigned to the Special Agent in Charge, Washington, D.C. I have been employed by DHS since 2003 and have seven years prior law enforcement experience. I have earned a Bachelor of Science degree in the field of criminal justice/psychology. Additionally, I have graduated from the Federal Law Enforcement Training Center's Police Mixed Basic Training Program, Prince William County Police Criminal Justice Academy, Federal Law Enforcement Training Center's Criminal Investigator Training Program and the Immigration and Customs Enforcement Special Agent Training Program. As part of your Affiant's current duties as an HSI agent, your Affiant investigates criminal violations relating to child exploitation, including violations which makes it a federal crime for any person to knowingly persuades, induces, entices, or coerces any individual who has not

attained the age of 18 years, to engage in any sexual activity for which a person can be charged with a criminal offense, or attempt to do so, in violation of 18 U.S.C. § 2422(b).

2. The statements contained in this Affidavit are based on my experience and background as a special agent working in the area of child exploitation and on information provided by other law enforcement agents. I have not set forth every fact resulting from the investigation; rather I have set forth a summary of the investigation to date. For the reasons set forth below, your Affiant contends that this affidavit contains ample probable cause to believe that RONDUM knowingly persuaded, induced, enticed, or coerced an individual who has not attained the age of 18 years, to engage in any sexual activity in violation of 18 USC § 2422(b), which makes it a federal crime for any person to knowingly persuades, induces, entices, or coerces any individual who has not attained the age of 18 years, to engage in any sexual activity for which a person can be charged with a criminal offense, including Section 18.2-61(a)(iii) of the Code of Virginia (rape of child under 13 years of age), Section 18.2-67.1(a)(i) of the Code of Virginia (forcible sodomy of child under 13 years of age), Section 18.2-67.3(a)(i) of the Code of Virginia (aggravated sexual battery of child under 13 years of age), or attempt to do so.

3. Section 18.2-61(a)(iii) of the Criminal Code of Virginia defines Rape as “sexual intercourse with a complaining witness, whether or not his or her spouse, or causes a complaining witness, whether or not his or her spouse, to engage in sexual intercourse with any other person and such act is accomplished . . . with a child under age 13 as the victim.”

4. Section 18.2-67.1(a)(i) of the Criminal Code of Virginia defines Forcible Sodomy as “cunnilingus, fellatio, anilingus, or anal intercourse with a complaining witness whether or not his or her spouse, or causes a complaining witness, whether or not his or her spouse, to engage in such acts with any other person, and . . . the complaining witness is less than 13 years of age.”

5. Section 18.2-67.3(a)(i) of the Criminal Code of Virginia defines Aggravated Sexual Battery as “sexually abuse [of] the complaining witness, and . . . the complaining witness is less than 13 years of age.”

DETAILS OF INVESTIGATION

6. On July 19, 2013, Special Agent Laws was acting in an undercover capacity on a social networking website. SA Laws was contacted by a subject using the username “Kreder Smith” via the social networking website. SA Laws continued communicating with “Kreder Smith” through email, Skype and Yahoo! chat. “Kreder Smith” provided his Yahoo! username as “Knuro” and his email address as knuro01@gmail.com.

7. On July 19, 2013, SA Laws received an email from knuro01@gmail.com which read, “Hi, thanks for direct email, cuts down on the ‘middleman’, so to speak.” Attached to the email was an image file titled “Jaye.pdf” which displayed a white male, white goatee, glasses, bald head, approximately 60-65 years of age.

8. On July 19, 2013, SA Laws responded to knuro01@gmail.com which read, “Yes it does and keeps our business, our business. So I am totally into everything young and have been for more years than I care to remember.”

9. On July 19, 2013, knuro01@gmail.com responded to SA Laws email, “Great to see you, buddy. Thanks a lot. Yng boys too? Hope I’m not being too formal

since I have no kids. But trying to meet my NEEDS here if you catch my drift. Best Knute”

10. On July 19, 2013, SA Laws responded to knuro01@gmail.com which read, “I am personally not into young boys although I have a boy that needs an adult friend. Ask anything you like I am as straight forward as you could want. I would totally love to watch someone with him if I could watch and jerk I am totally into his sister and have been since she was 4yo. He is 9yo and she is 10yo.”

11. On July 19, 2013, knuro01@gmail.com responded to SA Laws by email which read, “Is he a good boy?”

12. On July 19, 2013, SA Laws sent knuro01@gmail.com an email which read, “I guess that was to forward of me...didn’t mean to scare you off. If I didn’t read your last email correctly I apologize!!!!”

13. On July 19, 2013, knuro01@gmail.com sent SA Laws an email which read, “I think you read it right. Not offended at all, very excited about your post. Knute”.

14. On July 19, 2013, SA Laws responded to knuro01@gmail.com which read, “Good to hear back from you...have you ever had the chance to play with a young one?”

15. On July 19, 2013, knuro01@gmail.com responded to SA Laws via email which read, “Not ‘yet’. ;) Still trying. Btw, no problem with you watching, in fact, a turnon. Does boy see you and sister going at it?”

16. On July 19, 2013, SA Laws responded to knuro01@gmail.com via email which read, “Not really he has seen me doing some rubbing and stuff but not her sucking me or anything. We spend most Fridays watching porn and eating pizza on the couch naked. Get them used to seeing people fucking and sucking. Works like a charm.”

17. On July 19, 2013, knuro01@gmail.com responded to SA Laws email, "Oh hell, ya, Is their mother in the picture? K"

18. On July 19, 2013, SA Laws responded to knuro01@gmail.com email, "My ex is in prison for a long time, long story but she got all fucked up with some guy selling meth and got busted by the fucking feds. What a nightmare that caused me. Imagine your a long time pedo like me and you answer the door and there is a shit load of cops coming in with a search warrant. Dude I like to have a stroke. Then come to find out it's my wife that caused all the problems. WOW huh!! Anyhow, now its just me and the kids. We just recently moved from Alaska to the East Coast. -Jaye-"

19. On July 20, 2013, knuro01@gmail.com responded to SA Laws email which read, "Taking a little time to think about the above comments from you. And really dislike this form of communication because the written word is so, well, permanent! May I suggest Skype, Yahoo Messenger, or phone? I understand there are risks with these also. Each one offers instant messaging, the phone and text. But audio is good for all three...I am very interested in keeping this conversation going and learning more about you and you learning more about me to build trust. Please share your thoughts about this with me. Thank you."

20. On July 20, 2013, knuro01@gmail.com sent SA Laws an email which read, "I'll get onto YM in a few minutes-just finishing dinner cleanup! 18:45 hours Knute YM: knuro Sent from my iphone".

21. SA Laws and "Knuro" began communicating on Yahoo! chat. The following is a chat which occurred on July 20, 2013:

knuro (6:56:00 PM): hey buddy

knuro (7:11:02 PM): hi
Undercover (7:11:32 PM): how;s it going..get in a good workout
knuro (7:11:41 PM): I did pretty good yes
knuro (7:11:42 PM): thanks
knuro (7:12:04 PM): How's your day been?
Undercover (7:12:25 PM): Worked a bit, not just lounging watching house hunters
Undercover (7:12:36 PM): now just lounging rather
knuro (7:12:38 PM): ah yeah, I like that too
knuro (7:12:52 PM): loooking for baseball on tv but rather chat with you
knuro (7:12:54 PM): ;)
Undercover (7:13:10 PM): Cool me too
knuro (7:13:25 PM): you ok to chat audio/video? or?
Undercover (7:14:00 PM): let's get comfortable then we can possibly Skype Chat
knuro (7:14:07 PM): ok
knuro (7:14:12 PM): no problem
knuro (7:14:22 PM): just didn't want to type anything more than I have to
knuro (7:14:28 PM): :P
knuro (7:14:42 PM): if I disappear..storms here
knuro (7:14:46 PM): sometimes power goes out
Undercover (7:14:47 PM): No worries Yahoo doesn't keep the chats
knuro (7:14:52 PM): ok
knuro (7:15:02 PM): boy is 10?
Undercover (7:15:28 PM): No Mark is 9 Amy is 10
knuro (7:15:32 PM): ok
knuro (7:15:35 PM): she's older
knuro (7:15:37 PM): one year....

knuro (7:31:45 PM): I have a 'conditon' that I should tell you about, J.
knuro (7:31:51 PM): it is not medical
Undercover (7:32:00 PM): hmmm ok
knuro (7:32:26 PM): when I look at certain pics or toons of hairless and especially the
small holes/slits (camel toes)
knuro (7:32:31 PM): my mouth drools
knuro (7:32:38 PM): and my tongue get's stiff
knuro (7:32:41 PM): :P
knuro (7:33:03 PM): lips get wet
knuro (7:33:05 PM): and slick
Undercover (7:33:39 PM): That Sir is not a problem
knuro (7:33:45 PM): ok
knuro (7:34:15 PM): and I think about my face buried, my stach and goat lining one
Undercover (7:34:51 PM): you mean your face buried in a little smooth n bald crotch?
knuro (7:35:00 PM): >:)
knuro (7:35:17 PM): and lil red slick lips wrapped around my cockhead
Undercover (7:35:27 PM): AWESOME!!
knuro (7:35:40 PM): when she sucks you do you finger her?

Undercover (7:36:01 PM): in her ass from time to time
Undercover (7:36:08 PM): i LOVE oral
knuro (7:36:10 PM): not cunny?
Undercover (7:36:33 PM): haven't did much with her up front...she is still a virgin
knuro (7:36:39 PM): ok
knuro (7:36:49 PM): do you think Mark would be comfortable with me?
Undercover (7:37:10 PM): I think he would like to jerk you off
knuro (7:37:25 PM): that's a start
knuro (7:37:31 PM): B-)
Undercover (7:37:36 PM): and a good start
knuro (7:37:48 PM): probably would not take too long either
knuro (7:38:01 PM): does he jerk himself?
Undercover (7:38:13 PM): he does and it makes me laugh
Undercover (7:38:37 PM): can't do much with a 2 inch peter
knuro (7:38:41 PM): no
knuro (7:38:52 PM): but you should not laugh at him, buddy
knuro (7:38:55 PM): give him a complex
knuro (7:39:10 PM): how tall is he and how much does he weigh?
Undercover (7:39:54 PM): Well is is a big boy like dad, haven't weighed hm lately but he
is likely 75 or better
knuro (7:40:10 PM): chubby?
Undercover (7:40:26 PM): I like chunky
knuro (7:40:33 PM): ok, no problem
knuro (7:40:52 PM): and Amy?
Undercover (7:41:24 PM): Amy is the exact opposite...VERY skinny. I think it has to do
with her being a preme
knuro (7:41:31 PM): yes
knuro (7:41:40 PM): have you entered her ass ?
Undercover (7:42:19 PM): Oh Yea...started with 3 different size butt plugs and never
looked back
knuro (7:42:29 PM): you cum upher?
Undercover (7:42:55 PM): of course why waste a good load
knuro (7:43:27 PM): how far in do you get?
Undercover (7:43:53 PM): almost all the way about 4-5 inches
knuro (7:43:58 PM): ok
knuro (7:44:00 PM): good
knuro (7:44:06 PM): she try to milk it dry?
knuro (7:44:15 PM): or not able/willing to try that?
Undercover (7:44:38 PM): no been teaching her to take it all and not waste a drop

Undercover (7:47:40 PM): We have plenty of room
knuro (7:47:46 PM): :))
Undercover (7:48:40 PM): We have a finished basement with a bedroom and full bath,
rec room with tv so that is where we go to play...AMy and I
knuro (7:48:50 PM): understood

knuro (7:49:33 PM): how do you insure that she does not 'spill the beans' to someone, not even knowing what she is doing?

knuro (7:49:39 PM): that would be my fear

Undercover (7:50:18 PM): Pretty easy, themn being home schooled and us movine ever few years pretty much takes care of that

knuro (7:50:27 PM): ok

Undercover (7:50:40 PM): also we have been doing it ao long it's natural now

knuro (7:50:45 PM): they must play with local kids their ages

Undercover (7:50:54 PM): I try to keep to myself as much as possible

Undercover (7:51:42 PM): Yea but if kids are over they play in our yard which isn't often. They only have one little boy that comes over once or twice a month

Undercover (7:51:52 PM): we have only been here since September

knuro (7:51:57 PM): i c

Undercover (7:52:31 PM): So what about you ever played with a young one?

knuro (7:52:37 PM): nope

knuro (7:52:45 PM): did not get interested until about 15 years ago

knuro (7:53:17 PM): talked with guy on line who was telling me about his trailer trash buddy who rented out his 11 year old dau (the TT Buddy, I mean)

knuro (7:53:21 PM): got me thinking

knuro (7:53:24 PM): and looking

knuro (7:53:25 PM): etc

knuro (7:53:36 PM): now, Undercover

Undercover (7:53:38 PM): ahh that's cool

knuro (7:53:39 PM): I NEED it

Undercover (7:53:56 PM): What makes you think you could do it given the chance

knuro (7:53:57 PM): I'm 71 and hope it happens at least once before I die

knuro (7:54:19 PM): I am so stoked

knuro (7:54:20 PM): about it

knuro (7:54:31 PM): so turned on with what I've seen and heard

knuro (7:54:45 PM): even if 90% of the guys were bs-ers

knuro (7:54:45 PM): ok

knuro (7:54:49 PM): maybe 99%

knuro (7:55:07 PM): The word turns me on, if you know what I mean

knuro (7:55:26 PM): when I'm at the gym and see a naked boy with his da d in the locker room

knuro (7:55:41 PM): I look at them differently than I would have 10 years ago

knuro (7:55:46 PM): can you dig what I'm saying?

Undercover (7:56:02 PM): without a doubt

Undercover (7:56:22 PM): But thinking about it and actually doing it is two extremely different things!

knuro (7:56:23 PM): and I told you about my 'condition' did n't I?

knuro (7:56:24 PM): ;)

knuro (7:56:47 PM): I would be scared for sure

knuro (7:56:48 PM): but

knuro (7:56:57 PM): if trusting and comfortable
knuro (7:57:01 PM): >:)

22. On July 25, 2013, SA Laws, acting in an undercover capacity, spoke with “Knut” via Skype. The conversation, which lasted approximately 20 minutes, concentrated on their fondness for Apple computer products, the weather, “Knut’s” upcoming visit to Leesburg, VA and their future meeting with the children. During the Skype video chat, “Knut” appeared to be sitting in a bedroom, with blue walls, a bed directly behind him and a television over his left shoulder. Additionally, he was wearing a set of USB headphones with a boom mike attached. “Knut” is the same individual as described in paragraph 7.

23. Due to some extreme family matters occurring with the undercover agent, communications were sporadic from November 2013 through January 2014.

24. On November 7, 2013, an ICE administrative summons was sent to Verizon to determine additional information about the user “Knut”. “Knut” provided his phone number to SA Laws during a conversation. On November 14, 2013, Verizon provided the following information on the subscriber of “Knut’s” phone number. The subscriber is Knute S. Rondum, with a PO Box in Warren, New Jersey, 70590, with a set up date of March 28, 2001.

25. A query of publically available website revealed Knute S. Rondum, with a PO Box in Warren, New Jersey and an additional possible residential address in Warren, New Jersey 07059.

26. The PO Box information was provided to United States Postal Inspector Lescault who revealed the following information: Knute Rondum, with the same residential address as in Paragraph 25.

27. On November 13, 2013, an ICE administrative summons was emailed to Skype to determine additional information about the user "Knute". On November 15, 2013, Skype returned the following information on user "krondum": Knute Rondum, with the same PO Box as in Paragraph 24.

28. On January 26, 2014, knuro01@gmail.com sent SA Laws an email which read, "I'm mystified as to what's going on here. I've been wanting to write for a while but hoping that we could Skype and save me the effort of this tome. (LOL) We have been trying to connect real-time for almost a year now and I will admit that there have been problems on both sides...there have been long periods of non-communication with you (such as the recent cell phone issue)...First I'm 98% sure that this is not a setup/entrapment. But there is still at 2% that nags me that we might be able to resolve chatting on Skype...I want you to know that I made sure with medical testing that I would not be conducting anything into your household (testing completely in November and have not sexual contact since).

29. On February 24, 2014, SA Laws sent an email to knuro01@gmail.com which read, "Hey Knute, lets get some plans together and get to business..."

30. On February 24, 2014, knuro01@gmail.com responded with the following email to SA Laws, "I'm in So. Delaware with sister. I could come over late this week. Let's chat on Skype or phone."

31. On February 26, 2014, SA Laws made a recorded telephone call to “Knut” at a number he provided. During the conversation, “Knut” and SA Laws discussed plans for “Knut” to travel from New Jersey to Virginia for the purpose of engaging in sexual activity with Amy and Mark. In addition, “Knut” asked SA Laws if he had any “special porn, like the illegal stuff”. SA Laws stated he could get a video from a website which had a compilation of “Baby J” series and other juvenile females under the age of 10 being penetrated by adult males. “Knut” stated, “That would be fantastic. I am getting hard already.” “Knut” stated he would travel from his sister’s residence in southern Delaware to meet with SA Laws and the children in Fairfax, VA. Additionally, he stated he would like to stay overnight with SA Laws.

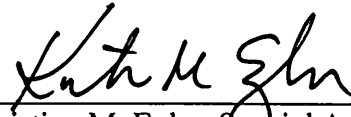
32. On March 1, 2013, at approximately 12:55 pm, your affiant witnessed a white male driving a red Toyota Rav4 with New Jersey license plate D42DBY arrive at the predetermined meeting location of 4040 Jermantown Road, Fairfax, VA 22030. The white male, wearing an orange colored shirt with tan pants, appeared to match the same person depicted in the photographs as described in paragraph 7.

33. Law enforcement approached the white male and placed him under arrest. Based on the male’s New Jersey driver’s license, he was identified as Knute RONDUM.

CONCLUSION

34. Based on the above information, there is probable cause to believe that RONDUM knowingly persuaded, induced, enticed, or coerced an individual who has not attained the age of 18 years, to engage in any sexual activity for which a person can be charged with a criminal offense, including Section 18.2-61(a)(iii) of the Code of Virginia (rape of child under 13 years of age), Section 18.2-67.1(a)(i) of the Code of Virginia (forcible sodomy of child under 13 years of age), Section 18.2-67.3(a)(i) of the Code of Virginia (aggravated sexual battery of child under 13 years of age), or attempt to do so, in violation of 18 USC § 2422(b).

Respectfully submitted,



Kristina M. Eyler, Special Agent
Department of Homeland Security,
Homeland Security Investigations

Sworn and subscribed to before me
this 4th day of March, 2014

/s/
Theresa Carroll Buchanan
United States Magistrate Judge

The Honorable Theresa Carroll Buchanan
United States Magistrate Judge
Alexandria, Virginia